

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WI-LAN INC.,)
Plaintiff,)
v.) 10 Civ. 432 (LAK) (AJP)
LG ELECTRONICS, INC. and LG)
ELECTRONICS U.S.A., INC.,)
Defendants.)

DECLARATION OF CRAIG K. TANNER

I, Craig K. Tanner, declare as follows:

1. I am an independent expert consultant retained to assist Wi-LAN, Inc. in this case. The following facts are within my personal knowledge and if called as a witness by the Court, I would be competent to testify to the matters set forth below.
2. I received a Bachelor of Science degree in Electrical Engineering and a Bachelor of Arts in Communications in 1975 from the University of Delaware. I also earned an MBA in Finance from Fairleigh Dickinson University in 1981. I have more than 34 years experience in television technology and standards, including serving as the Executive Director of the Advanced Television Systems Committee (“ATSC”), which is an organization that is responsible for issuing television transmission standards.
3. I have been asked, and I have provided, expert opening and rebuttal reports on issues involving the patent-in-suit in this case. I am therefore competent to testify, and if I am asked I may testify, as to any of the facts and/or expert opinions discussed in these reports, which are identified below.

4. The information provided within the report entitled Opening Expert Report and Disclosure of Craig K. Tanner Under Rule 26(a)(2)(B), Fed. R. Civ. P. ("Tanner Infringement Report") attached hereto as Exhibit A, is a fair and accurate reflection of the facts and opinions that if asked I may testify to regarding each of the topics discussed therein.

5. The information provided within the report entitled Rebuttal of Craig K. Tanner to the Expert Report on Invalidity by Adam Goldberg ("Tanner Rebuttal Invalidity Report") attached hereto as Exhibit B, is a fair and accurate reflection of the facts and opinions that if asked I may testify to regarding each of the topics discussed therein.

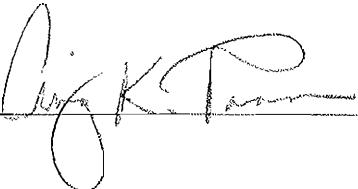
6. The information provided within the report entitled Rebuttal of Craig K. Tanner to the Expert Report on Doctrine of Equivalents ("Tanner Doctrine of Equivalents Report") attached hereto as Exhibit C, is a fair and accurate reflection of the facts and opinions that if asked I may testify to regarding each of the topics discussed therein.

7. The information provided within the report entitled Declaration of Craig K. Tanner, submitted to the Patent Office on October 29, 2010 ("Tanner Declaration") attached hereto as Exhibit D, is a fair and accurate reflection of the facts and opinions that if asked I may testify to regarding each of the topics discussed therein

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15th day of April, 2011 at Washington, DC.

Craig K. Tanner

A handwritten signature in black ink, appearing to read "Craig K. Tanner", is written over a horizontal line. The signature is fluid and cursive, with "Craig" on the left, "K." in the middle, and "Tanner" on the right.